UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,)
Plaintiff,)
v.)
ERIN T. WITHINGTON and CITY OF BOSTON,) Civil Action No. 04-cv-11948-RGS
Defendants.)))

JOINT STATEMENT TO BE READ TO PROSPECTIVE JURORS

The Plaintiff, Seyed Mohsen Hosseini-Sedehy, alleges that the Defendant, Detective Erin Withington, violated the Plaintiff's constitutional rights when she arrested him. The Defendant, Detective Erin Withington of the Boston Police Department, denies the Plaintiff's allegations and contends that she lawfully arrested the Plaintiff based on the facts and circumstances known to her at the time of the Plaintiff's arrest.

Respectfully submitted,
PLAINTIFF, SEYED MOHSEN
HOSSEINI-SEDEHY,
By his attorney,

/s/ Gerard Butler

Gerard A. Butler, Jr., BBO# 557176 Smith & Duggan LLP Lincoln North 55 Old Bedford Road Lincoln, MA 01773-1125 (617) 228-4400 DEFENDANT ERIN WITHINGTON, By her attorney:

/s/Helen G. Litsas

Helen Litsas, BBO# 644848 MaryBeth C. Long ##652840 Assistant Corporation Counsel City of Boston Law Department Room 615, City Hall Boston, MA 02201 (617) 635-4099